

To the District Court, Northern District of Ohio

1:17 CV 1788

JUDGE GIVIER

UNITED STATES OF AMERICA

BY ANTOANETA IOTOVA AND ISSAK ALMALEH

vs.

OCWEN FINANCIAL CORPORATION

ALTISOURCE SOLUTIONS, INC.

ALTISOURCE ONLINE AUCTION, INC.

SHAPIRO & FISHMAN LLP

RONALD WOLFE AND ASSOCIATES (AKA FLORIDA DEFAULT LAW GROUP)

CIARFIELD, OKON, AND SALOMONE P. L.

BLANK AND ROME LLP

THE BLANCH LAW FIRM

MAG. JUDGE RUIZ

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

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FILED

**Violations:**

**31 U.S.C. § 3729-3733 False Claims Act**

**Major fraud against the United States – 1  
count**

**Conspiracy to commit major fraud against  
the United States –1 count**

**Wire fraud – 1 count**

May we please the Court, Plaintiffs appear on behalf of the United States of America in this qui tam case, a whistleblower case under 31 USC 3729-3733 code and claims as follows:

1. Defendants systematically has robbed the United States by stealing residential properties from 2008, selling them and keeping the proceedings of these sales in their companies at home and abroad without paying any taxes or any other obligations to the United States.
2. Defendants systematically and fraudulently has represented all of the major banks of the United States, including but not limited to Bank of America, Wells Fargo Bank, Chase Bank and many others dead or alive banks in fraudulent foreclosure schemes.
3. Defendants systematically were involved in fraudulent securitization of mortgages without having any kind of connection with the real owner and then have used these instruments for fraudulent foreclosures.
4. Defendants were systematically involved in robo signing of mortgages, mortgage assignments frauds, using existent and none existent assignors.
5. Defendants were systematically involved in exporting money abroad in the amount of trillion dollars to Europe, Africa and Asia, resulting from the sales of the US residential properties.
6. Defendants were systematically used the accumulated capital abroad in actions and schemes, acting against the interests of the United States of America, including terrorism.

#### History of the problem

1. The national wealth of the United States consists almost 70% of residential properties. After the big financial crisis hands of thousands attorneys are stretched to that wealth and without any active intervention from the prosecution, mainly on Federal level, these attorneys steal and sell the said properties with fraudulent documents and fraudulent representation of defaulted financial institutions. (Exhibit1) 90% of the money of these sales are

exported abroad to be covered the traces of the big theft. Plaintiffs noticed that in South Florida the most active participant in that fraud done on the foreclosure market was Ocwen Financial, for shortness here and further to be read Ocwen. Being a Liechtenstein registered corporation with the name Altisource, they exported all of the money accumulated abroad to India, Africa and Liechtenstein for financing of different schemes, including against the interests of the United States. In the last years this way illegally are sold around 500,000 properties and the profit from these sales have generated around 2 trillion dollars, and were hidden taxes of around 700 billion dollars. The Prosecutors offices on every level were informed for these crimes but didn't do anything to prevent the thefts. This is one of the biggest crime in the United States in the last years that drained the country of vital resources and left thousands American citizens on the streets and without homes. The above Defendants are involved in the disappearance of \$700 billion taxes from the government budget, a very serious federal crime.

2. Ocwen, the main participant in the scheme, owned one of these bogus banks in California, that defaulted during the crisis in 2008, but could steal some money and to transfer their activity on the East Coast. Their representatives are involved in all the robo signing of mortgage notes, and all fraudulent notarizations and transfers. One page of a Report with that content is presented in Exhibit 2. The report of 99 pages prepared from investigation of the Attorney General of Florida in 2011, where some of the investigated participants, like attorney Marshall Watson who was punished and attorney David Stern, who lost his attorney license. Ocwen and Shapiro and Fishman, the other two most mentioned companies, done the most of the fraudulent transactions, were not even touched, but increased their activity and occupied the business of the other companies. Now Ocwen pretends to represent all the US banks, all the financial institutions, dead or alive, because they had government umbrella and financial resources to smash anybody who would be willing to challenge them. They do most of the sales on the website Hubzu.com and that way avoiding any title searches and cloudy money transfers. The site is one illegal laundry of all illegal financial transactions,

through which big amounts of money change their ownership and money circulate easily in and out of the country. Actually Ocwen are foreign corporation, named Altisource, registered in Liechtenstein, offshore zone, who was involved in exporting money abroad to India and Africa to finance overseas illegal activity and terrorism.

3. Plaintiffs tried to inform many times during the last years FBI, the US Attorney, Department of Justice and the President of these crimes of Ocwen and connected attorneys, the Defendants above. Without much success. Nobody was charged and even touched. They continued to do their criminal business untouched. Instead Preet Bharara former US Attorney, together with some investigators federal agents start malicious prosecution and active chase on Plaintiffs family and the companies owned by the Plaintiffs and the properties of the Plaintiffs, who are doing only legal business activity, under legally registered US corporations. The family of the Plaintiffs is exposed to constant political, economic and psychological terror in the last years. The idea is to smother the Plaintiffs financially, they to accept claimed assumptions and to be deprived of liberty and their mouths shut. The whole campaign is organized under the supervision and order of the corporation Ocwen on behalf of which were sold thousands illegally obtained properties. The State Attorney of New York State restricted the activity of the said corporation in the state, but they continued to operate actively in South Florida, where the Plaintiffs currently reside. In South Florida Ocwen became absolute monopolist on the whole residential market after the expropriation of roughly 65000 properties, again with fraudulent documents and fraudulent representation.
4. The scheme is as follows, Most of the residential properties entered the crises of 2008 with big mortgages to different financial institutions. Then these mortgages has to be foreclosed. But the Law has very strict and different regulations that require preparing of documents. No matter if the mortgagor even exist, the Defendants prepared fraudulent assignments of mortgages, signed by one of the people in their firm, then they used an attorney to file a mortgage foreclosure case in the court, the price of 400 dollars. Some of the judges that required more strict policy against the so called "banks", actually

the said Defendants, were fired to be cleared the process of further fraudulent foreclosure. Without any problems and not much money spent in court proceedings, usually not more than 2000 dollars, the criminals, the said Defendants, acquired the houses of thousands of people.

5. The said residential properties, after being foreclosed with fraudulent documents, meaning stolen, are sold through auction sites, like Hubzu.com, owned by Altisource. There, the corporation declares that it owns all the properties, that actually are bank owned, REO properties of the biggest banks in the US. Then the titles are prepared in the offices of Ocwen in Georgia, where they have headquarters and then the money start their route abroad. This scheme is made by different attorneys, including the Defendants here, who partly worked for themselves or partly hide behind Ocwen, saying that they represent Ocwen, who represent the bank X or Y, as servicer of the bank X or Y and the mortgage foreclosed. Mostly the deeds are signed by the secretary in the office of Ocwen, Jami Dorobiala, a notary public. The same woman is involved in many robo signing schemes in California and is mentioned in many reports of different fraud investigations. Also other names are largely used like Linda Green and Scott Anderson, again from Ocwen.
6. Plaintiffs started to search methods to prevent the scheme without much success. They believed that the chaos created by that crime could have devastating consequence to the United States market and could deprive the country of vital resources. When they started their own investigation, brutal attacks against the Plaintiffs started in 2015 with an attack of the police in Hallandale Beach, Florida, organized against the Plaintiff Antoaneta Iotova. She, being in an isolated place, local tennis court, with two minor kids, was attacked by three police cars and accused of felony for playing tennis with more than eight balls and was forced and pressed to death by more than 5 police officers. The real reason for this attack was that the Plaintiff has to appear the next day in court as representative of one of her corporations and to fight against the same corporation Ocwen regarding the ownership of a property. The leading police officer of the attack in the tennis court is of Indian origin, named Cheryl Ramsaroop. That is how things started to evolve

and to be discovered the umbrella above the activity of Ocwen, the Indian connection. It appeared that the company has Indian origin and the main office is in India, so it is an Asian corporation.

7. Ocwen changed its ethnical characteristic in the last years and hired many Indians, including criminals. Pictures of the staff are attached from the Facebook profile of the corporation Altisource in Exhibit 3, where these people celebrate and boast they have smashed another company from their competition NationStar Mortgage. The leading police officer of the attack in the tennis court is also of Indian origin, named Cheryl Ramsaroop. The ex USA Attorney from New York, leading the investigation against the Plaintiffs is also of Indian origin named Preet Bharara. Indian engineers and computer specialists from Ocwen started to follow the activity of the computers of the Plaintiffs and their all moves in the country and outside it.

Against other competitors and rivals of the Defendants were sent also criminals. Such criminals and set up people, who, hiding as customers or even friends of the Plaintiffs, created many situations, where the Plaintiffs were beaten, stabbed to death and police was called for them all the time, saying that the Plaintiffs are doing something wrong. By criminalizing their competitors, Defendants monopolized the whole market and paralyzed all their opponents.

8. The second attack against Plaintiff Antoaneta Iotova was made in November 2016, a week before the elections, where the Plaintiff was running for Florida Senator of the Republican Party in an area where the Democratic Party had a leading position before the Presidential elections. Her name has to be slandered and her chances smashed with force organized by the Democratic Party officials before the elections. She was accused of renting a property, that she doesn't own, accused of theft, when she is one of the owners of the corporation owner of the property and had full right to rent that property. The said corporation is used in a malicious prosecution, organized by the Defendants against the Plaintiffs. The said property is again stolen from Ocwen and "sold" to another attorney with the Russian name Ivan, who then transferred two times the same property to cover the traces of the theft.



9. Then we come to the culmination of the abuse and harassment against the Plaintiffs, with the idea to find out all the information they have about the activity of these corporations Defendants abroad, their government umbrella, and the channels of the money.

Federal agents, organized by the Preet Bharara, the US prosecutor, attacked the house of the Plaintiffs, searched and seized everything in the house, all the documents, all the electronic devices, all the court documents, all the registrations and other compromising documents against the Defendants. They confiscated all the computers of the Plaintiffs, passports, ID cards, any traces of their existence, and tied them with electronic devices, not to have any contacts with their friends and family and to literally die from hunger, because they are not able to search for work. Plaintiff Issak Almaleh is disabled 64 years old person, kept 45 days in Federal prison in isolator by the same people. When released he could hardly walk, used wheelchair and went to rehabilitation. He is not getting Social Security, because the same Defendants organized the scheme to stop his money. They closed his account in the bank, they closed his account in Pay Pal, they harassed him in any way they could. They even took the tablets of his minor kids they were doing their homework, shortly all the electronic devices of the family that they could use to communicate with the world. They were even left without telephones, cheap windows telephones. In short all the crimes done by the Defendants, they were trying to transfer to someone else to exit clean of the fraud. All the traces of the Defendants' crimes have to be destroyed and covered. The attack against the Plaintiffs was made by the Federal Deposit Insurance Corporation agents from Georgia, where is located the office of Ocwen and where he could find best support.

10. The Prosecution for this third case was made by US Attorney Preet Bharara, now fired by the new administration. The same person was working with agent Jamie Brooks, who pretended to work for FDIC, but signed herself her subpoenas claiming to work for private law firm Blanch. Who is that Blanch Law Firm with offices in New York and California to sign subpoenas on behalf of the Federal Government. Blanch Law Firm is a private criminal defense

attorneys firm, who also has a leading Indian in it Sumeet Sodhi, who claims to be specialist in foreclosure fraud. It is clear that the investigation was not done from federal agency but private corporation with private interests in the case. The leading attorney in Blanch Law firm is Ryan Blanch, not a Federal employee, with offices in New York and California where the leading attorney is with Russian origin Alana Yakovlev, also not federal employee.

11. While this company Blanch Law Firm operates in New York and California states, a company with similar name Blank and Rome LLP, (Rome could come from Roma, meaning Gypsy, popular name in Europe for the tribes that have Indian origin.) This Blank company is operating in South Florida, again with leading attorney with the Indian name Paul Sodhi, like the one that was working for the investigation against the Plaintiffs from Blanch Law Firm from New York, Sumeet Sodhi. Other Muslims are attached to that Law Firm like Abdullahi Abdullahi from Texas. These people in South Florida are hired to attack the Plaintiffs in civil cases. Now we are talking about an organized group of people to commit an organized crime, that has representatives in different states, very well organized and financed, all of them with Muslim origin.
12. The Defendants and their government supporters organized a fraudulent criminal case against the Plaintiffs in the Southern District of New York. They conducted it around the elections. That shows that the Defendants were in a hurry to hide their traces, scared by the rise of President Trump and the whole scheme is closely connected with the elections. Plaintiff Iotova is Doctor of Economics and Graduate from the Columbia University in New York in antiterrorism and security issues of the international relations. She is a Republican Party committeewoman and candidate for Florida Senator for the Republican Party. Antimuslim rhetoric of Trump scared the Defendants. Ocwen new ethnicity is mostly Muslims, who are trying to inflict Muslim religion in the United States. Looking at the pictures from Exhibit 3 are seen people from Alrisource that are doing some war connected rituals with cold weapons. Large amounts of the resources, accumulated through the said criminal scheme, are exported and used for the same reason, Islamization of



the meeting is jeopardized and not confidential and all the attorneys are scared to help.

2. Plaintiffs ask the Honorable Court to involve the Department of State and the Department of Justice and the President about the crimes against the United States of America, conducted by the said Defendants. Plaintiffs ask their active participation.
3. Plaintiffs ask the Honorable Court to order start of investigation against the Defendants and their criminal connections with government officials and their connections and supporters abroad. Plaintiffs ask to actively participate in that investigation as leading investigators. Plaintiffs can cooperate and help with the information that could lead to the restore of these 700 billion dollars in taxes, that are not going to the budget of the country, but finance illegal activities abroad. Plaintiffs ask for order from the court for budget for the said investigation from the Department of Finance of the amount of 1 million dollars to start the investigation.
4. Plaintiff asks the court to declare the prosecution against them, leading to case 2017- CRIM 0025 in Southern District of New York malicious and the case to be immediately closed.
5. Plaintiffs ask the Honorable Court Defendants to be charged with all the expenses for the investigation against them.
6. Plaintiffs ask an order for all the expenses for this action and the expenses of the Plaintiffs and their attorneys for the whole terror they were exposed in connection with the said abuse and harassment in the amount of 1 million dollars.

7. Plaintiffs ask for reasonable compensation from the government for the whistleblowing, to be compensated with not less than 20% of the restored money to the American people and to this great country.
8. Plaintiffs ask their companies to continue their legal activity untouched.
9. The said people owners and managers of the said corporations Defendants to be immediately arrested. Plaintiffs ask for immediate order from the court.
10. All the offices of the said corporations to be searched and seized, immediate order to be given by the court.
11. All the foreign people, corporations and entities, connected with the said crime to be extradited and Plaintiffs are asking for court order to be delivered to the responsible authorities abroad.
12. All the government agencies and officials, showing any connections with the said Defendants also to be searched and seized and if reasonable doubt of criminal connection exists to be arrested like the Defendants. To be investigated in the first place the prosecutors in the criminal case in Southern District of New York case 2017- CRIM 0025, and federal agents participating in the arrest of the Plaintiffs.
13. The case to be sealed till the Defendants are arrested and their offices searched and seized.

On behalf of the United States:

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